

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON

S&T OIL EQUIPMENT & MACHINERY LTD.,)
VALERIAN SIMIRICA,)

vs.)

Cause No. H-11-542

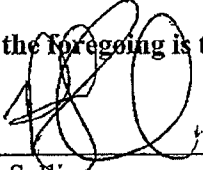
JURIDICA INVESTMENTS, LTD.,)
JURIDICA CAPITAL MANAGEMENT LIMITED)
JURIDICA CAPITAL MANAGEMENT (US) INC.)

SECOND DECLARATION OF PAUL SULLIVAN

1. My name is Paul Sullivan.
2. I am over 18 years old; I am competent to testify in this matter; and I have personal knowledge of the matters set forth below.
3. I am the Senior Vice President for Juridica Capital Management (US) Inc. ("JCMUS"), one of the named defendants in the above action.
4. Attached hereto as Exhibit A is a true and correct copy of materials printed from the website for the International Centre for Settlement of Investment Disputes, which was accessed on March 14, 2011, at <http://icsid.worldbank.org/ICSID/Index.jsp>.
5. Attached hereto as Exhibit B is a true and correct copy of a wire confirmation showing a payment of \$750,000 from Juridica Investment Limited's account in Guernsey to Plaintiffs' counsel on June 17, 2008, as required by the parties' Investment Agreement.
6. Attached hereto as Exhibit C is a true and correct copy of materials printed from the website for the London Court of International Arbitration, which was accessed on March 14, 2011, at <http://www.lcia.org>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3/16/11



Paul Sullivan

EXHIBIT A

International Centre for Settlement of Investment Disputes (ICSID)

About ICSID

ICSID is an autonomous international institution established under the Convention on the Settlement of Investment Disputes between States and Nationals of Other States (the ICSID or the Washington Convention) with over one hundred and forty member States. The Convention sets forth ICSID's mandate, organization and core functions. The primary purpose of ICSID is to provide facilities for conciliation and arbitration of international investment disputes.

The ICSID Convention is a multilateral treaty formulated by the Executive Directors of the International Bank for Reconstruction and Development (the World Bank). It was opened for signature on March 18, 1965 and entered into force on October 14, 1966.

The Convention sought to remove major impediments to the free international flows of private investment posed by non-commercial risks and the absence of specialized international methods for investment dispute settlement. ICSID was created by the Convention as an impartial international forum providing facilities for the resolution of legal disputes between eligible parties, through conciliation or arbitration procedures. Recourse to the ICSID facilities is always subject to the parties' consent.

As evidenced by its large membership, considerable caseload, and by the numerous references to its arbitration facilities in investment treaties and laws, ICSID plays an important role in the field of international investment and economic development.

Today, ICSID is considered to be the leading international arbitration institution devoted to investor-State dispute settlement.

EXHIBIT B

017
ePay Reference Search (Operations)

CST

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Sarah Wright
714061.

Transaction Details

Payer Juridica Investments Limited
[REDACTED]
USD 750,000.00

Beneficiary King Spalding Lip Escrow
1180 Peachtree Street
Atlanta, Georgia 30309
8800312921

ePay Status Processed (PRO)

Additional Details

Cust to Cust Reginald R. Smith,
[REDACTED]

Beneficiary Bank Suntrust Bank
Po Box 4418 Atlanta
United States Of America
SNTRUS3A

Receiving Bank Wachovia Bank Na
301 South College Street Charlotte
United States Of America
PNBPUS3NNYC

Branch Name Royal Bank Of Scotland International, Guernsey (2029)

Rel Manager Mike Lewis

Initial Failure Reasons Customer Instructions

Payment Details

Type eQ (SWIFT)
View Audit Trail

References

ePay [REDACTED]
IBBA [REDACTED]
eQ [REDACTED]

Dates

Created 17/06/2008
Transaction 17/06/2008
Value 17/06/2008

Users

Inputter system
Repalrer yatesda
Verify (1st) canippa
Verify (2nd) monuloc
Locked By N/A

EXHIBIT C



- [Home](#)
- [About the LCIA](#)
- [Dispute resolution services](#)
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Membership of the LCIA Users' Councils

26th February 2011

Membership of the LCIA Users' Councils

The LCIA's dispute resolution services are available to all contracting parties, without any membership requirements.

However, in addition to those services, the LCIA does have a general membership for which it organises a worldwide programme of conferences, seminars and other events of interest to the arbitration and ADR community. This general membership is organised into Users' Councils, which have been established to provide and maintain its worldwide services and to meet the developing needs of the business community.

The LCIA Users' Councils are:

African Users' Council
Arab Users' Council
Asia Pacific Users' Council
European Users' Council
Latin American and Caribbean Users' Council
North American Users' Council

Each Council has its own officers and devises its own programme of activity appropriate to the needs of the region. Members may elect to which Council they wish to join. All members receive advance notice of all events arranged by the LCIA, irrespective of the Users' Council to which they are attached.

Membership of LCIA Users' Councils is open to any person or body of good standing with a *bona fide* interest in international commercial arbitration or ADR, including including lawyers, arbitrators, mediators, experts, academics, businessmen, law firms and commercial and trading organisations.

Currently, the Users' Councils have more than 1,600 members from over 80 countries.